

TO: RETI Stakeholder Steering Committee &
RETI Coordinating Committee
FROM: Alliance for Responsible Energy Policy (AREP)
SUBJECT: **Comments on the RETI Phase 1A Draft Report**
DATE: March 25, 2008

Thank you for the opportunity to comment on RETI's Phase 1A Report. AREP will offer: General Comments; Specific Comments related to Technological Assumptions, and; General Conclusion about the RPS Goals and RETI Process.

GENERAL COMMENTS

In reviewing the RETI Phase 1A Draft we have found that the study and preparation of the report is in urgent need of a comprehensive treatment of environmental issues. Substantive investigation and analysis are necessary in order to balance environmental covenants and requirements with corporate cost-benefit goals. We are concerned that the inclusion of environmental groups in this process has not advanced important environmental topics in an effective manner. We have also found that AB-32 and California's RPS goals are greatly lacking logical and careful study. It is necessary to create plans and objectives that take into consideration the total effect on our environment.

SPECIFIC COMMENTS ON TECHNOLOGICAL ASSUMPTIONS

Anaerobic Digestion Has multiple positive environmental impacts and is a significant contributor to greenhouse gas emissions but is likely to be ignored by RETI because it is largely viewed as a distributed source.

Landfill Gases The combustion of Land Filled Gases (LFG) releases pollutants into the atmosphere similar to fossil fuels. Processing combustion of LFG requires construction of plants to house and run reciprocating engines. The RETI Phase 1A Draft Report does not address the environmental impact caused by construction and operation of reciprocating engine plants.

Solar Thermal Concentrated Solar Projects (CSP) requires tens of thousands of acres of land (7 to 10 acres per MW). Construction of CSPs requires scraping, blasting and drilling, destroying habitat and compromising the desert ecosystem. Wet cooled plants and washing mirrors use millions of gallons of precious desert water each year and contaminates ground water aquifers. CSPs are hybrids producing up to 25% of their energy from burning fossil fuels. The construction of CSP and corresponding access roads and fencing will further disrupt plant and animal habitat including migration, mating patterns and damage of many species.

Solar Photovoltaic As the draft report notes photovoltaic (PV) systems are unobtrusive to the environment and human health. Projections for utility-scale PV systems are considered cost prohibitive and are ruled out on that basis. However, the distributed application of PV systems is not considered by RETI as distributed PV precludes transmission. In fact, the entire potential of wide-spread distributed PV generation is excluded from consideration of energy need.

Hydroelectric The draft report notes that damming rivers has significant environmental impacts. It points to the fact that migration of fish and spawning habits are seriously disrupted, it also notes that damming floods valleys, wilderness and residential areas and disrupts archeological remains. The report mentions that altering natural water-ways destroys ecosystems that depend upon downstream flows. All across our nation and around the planet humans are destroying dams built decades ago as we have learned about their destructive impact on the environment. Demonstrating a lack of research in environmental concerns, the draft report recommends hydroelectric sites as cost-effective and reliable sources of generation that can provide substantial amounts of energy.

Geothermal The report contends geothermal development has relatively few environmental impacts. However, it ignores the land area that must be set aside for the power plants, substations, power lines and access roads in remote areas. Disruption of habitat from exploration activities, drilling and pipelines are noted but are summarily dismissed by re-vegetated efforts – conclusions which are inefficient and short-sighted.

Wind The report notes environmental considerations associated with wind turbines such as visual and noise impacts, avian fatalities and other wildlife burdens. Ridgelines are often disrupted for maximum wind capture. However, infrastructure land preparation, access roads and destruction of native plant and animal habitats are not addressed.

GENERAL CONCLUSION RE: RPS GOALS AND RETI PROCESS

AB-32, SB-1059 and RETI (evidenced in the RETI Phase 1A Draft Report) have:

- ☐ Preconceived utility-scale energy need without benefit of careful analysis.
- ☐ Structurally ruled-out participation and consideration of energy generation and conservation alternatives which eliminate need for remote utility-scale projects and resulting long-distance transmission.
- ☐ Fast-tracked regulatory and environmental covenants that protect public and private lands.

The RETI Phase 1A Draft Report demonstrates an unbalanced overview between vital environmental components and long-distance transmission. The report predominantly ignores site destruction and transmission impacts, which are significant. It also fails to supply a comprehensive overview of all energy possibilities such as local generation of wind and solar, conservation and distributed generation.

While the focus of the RETI 1A Draft Report looks to the future, the true wave of the future is in point of use system technologies, which are readily available. Energy planning that does not take into account many of the great advances in technology and energy awareness is ultimately antiquated and untenable.

Respectfully submitted,
The Alliance for Responsible Energy Policy